## **REMARKS/ARGUMENTS**

Claims 1-10 and 12-32 are currently pending with claims 1, 10, 22, and 25 having been amended.

Claims 1-4, 8-9, 25, 27-28, and 31-32 are rejected under 35 U.S.C. 103(a) as being unpatentable over Kara et al., U.S. Patent No. 6,249,777 B1, in view of Goldberg et al., U.S. Patent No. 5,848,401.

Claims 5, 10, 12-13, 15-16, 18-19, 21-24, and 26 are rejected under 35 U.S.C. § 103(a0 as being unpatentable over Kara in view of Goldberg and Meyer et al. U.S. Patent No. 6,915,271.

Claim 1 has been amended to overcome the rejection over Kara in view of Goldberg. Specifically, claim 1 has been amended to recite, "verifying that a user is an authorized user and that a serial number of a medium on which the stamp is to be printed is an authorized serial number; if the user is an authorized user and the serial number is an authorized serial number, receiving a print program from said website server over the Internet."

Kara describes a postage printing system configured to demand postage from a remote system via a demand program. The demand program is configured to receive a user input for postage and to request the postage from the remote system. The user input may be requested from a webpage and proved via a JAVA applet. See Kara at column 6, lines 13-38. Nowhere does Kara describe that prior to downloading a print program for printing a stamp that the user is verified as an authorized user and the serial number for the medium on which a stamp is to be printed is an authorized serial number. By verifying both the user and the serial number, amended claim 1 provides steps for inhibiting fraud on a stamp vendor, and further provides for fraud prevention for the receipt of the print program if the user and the serial number are verified. Because Kara fails to show or suggest such authorization and conditional receipt of a print program, Kara further fails show or suggest every limitation of amended claim 1.

Goldberg fails entirely to make up for the deficiencies of Kara. Goldberg discusses a handheld portable postage printing meter configured to use partially printed labels. The postage indicia is added to the partially printed label by the meter if a user directs the meter

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to print a stamp. See the abstract of Goldberg among numerous other places. Nowhere does Goldberg discuss the downloading of a print program from the Internet to the meter, and certainly does not discuss conditional downloading of a print program based on user and serial number verification. Therefore, Goldberg fails entirely to make up for the deficiencies of Kara. Therefore, Kara and Goldberg fail to render claim 1 obvious.

Independent claim 10 recites similar limitations to those limitation of claim 1 distinguished from Kara and Goldberg above. Independent claims 22 and 25 have been amended to recite similar limitations to those limitation of claim 1 distinguished from Kara and Goldberg above. Therefore, for at least the same reasons that Kara and Goldberg fail to render claim 1 obvious, Kara and Goldberg similarly fails to render each of claim 10, 22, and 25 obvious.

Further regarding claim 10, Meyer fails to make up for the deficiencies of Kara and Goldberg. Meyer describes a system for distributing promotional incentives electronically to consumers. See the abstract of Meyer. Nowhere does Meyer discuss the downloading of a print program from the Internet to a meter and certainly does not discuss conditional downloading of a print program based on user and serial number verification. Therefore, Meyer fails entirely to make up for the deficiencies of Kara and Goldberg. Therefore, Kara, Goldberg, and Meyer fail to render claim 10 obvious.

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## **CONCLUSION**

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance and an action to that end is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 650-326-2400.

Respectfully submitted,

/Rodney C. LeRoy/

Rodney C. LeRoy Reg. No. 53,205

TOWNSEND and TOWNSEND and CREW LLP Two Embarcadero Center, Eighth Floor San Francisco, California 94111-3834

Tel: 650-326-2400 Fax: 415-576-0300

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